

ATTACHMENT F

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March 31, 2020

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Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gursewak Singh v Lintech Electric Inc., et al
United States District Court EDNY 18 CV5780

Dear Magistrate Gold:

The Court approved revised case management schedule directed on March 2, 2020 that:

Defendant within 10 days will provide plaintiff all banking statements or the period of plaintiff's alleged employment for any account defendant issued checks payable to the plaintiff.

Defendant has failed to comply.

An email to defendant's counsel on March 28 to inquire about that outstanding discovery was ignored.

A follow up email was sent and yesterday, defendant's counsel by email wrote:

We are working on supplementing the bank statements. I'm waiting on my client to provide me a response.

In view of defendant's past history of failing to comply and the limited time left to complete discovery, plaintiff seeks a conference to obtain leave to move to strike defendant's answer and/or preclude defendant from testifying about his banking records and/or other appropriate relief.

Respectfully submitted,


JONATHAN SILVER

From: Jason@levinepstein.com,
To: juanplata@aol.com,
Cc: Joshua@levinepstein.com,
Subject: RE: Singh v. Lintech Electric, Inc. et al - Pending Schedule
Date: Mon, Mar 30, 2020 6:26 pm

Jonathan,

Everything we have produced so far, including your client's cashed & deposited checks, is accessible online, on Dropbox.com.

We are working on supplementing the bank statements. I'm waiting on my client to provide me a response.

Jason

Jason Mizrahi, Esq.

Levin-Epstein & Associates, P.C.

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From: juanplata@aol.com <juanplata@aol.com>
Sent: Monday, March 30, 2020 6:05 PM
To: Jason Mizrahi <Jason@levinepstein.com>
Subject: Re: Singh v. Lintech Electric, Inc. et al - Pending Schedule

you have not responded to my email of March 28 that asked why your client has not complied with the Court directive that provided:

Defendant within 10 days will provide plaintiff all banking statements for the period of plaintiff's alleged employment for any account defendant issued checks payable to the plaintiff.

if I do not get compliance by tomorrow noon I will make application to the Court to seek appropriate relief